

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

CORPORAL TRINIDAD NAVARRO,

Plaintiff, : C.A. No. 05-565 GMS

v. : JURY TRIAL DEMANDED

CHRISTOPHER A. COONS,
individually and in his official capacity;
GUY H. SAPP, individually and in his
official capacity; and NEW CASTLE
COUNTY, a municipal corporation,

Defendants. :

PLAINTIFF'S SPECIAL INTERROGATORIES
TO THE JURY

Do you find from a preponderance of the evidence:

1. That the actions of the Defendant were "under color" of the authority of the State?

Yes or No _____

2. That the Plaintiff engaged in constitutionally protected political activity, a form of free speech, as defined in the court's instructions by exercising his right to political association and freedom of speech?

Yes or No _____

3. That such protected political activity by the Plaintiff was a substantial or motivating factor in the Defendant's decision to not promote the Plaintiff?

Yes or No _____

If you answered No to any of the preceding questions you need not answer the remaining questions.

4. That the Defendant's acts were the proximate or legal cause of damages sustained by the Plaintiff?

Yes or No _____

SO SAY WE ALL.

Foreperson

Dated: _____